

HITCHCOCK, HICKS & CONLOGUE

ATTORNEYS AT LAW  
POST OFFICE BOX 87  
COPPER QUEEN PLAZA  
BISBEE, ARIZONA 85603-0087  
TELEPHONE (520) 432-2279



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Arizona Corporation Commission

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1 Attorney For

2  
3 Sulphur Springs Valley Electric Cooperative, Inc.

4  
5 CHRISTOPHER HITCHCOCK  
STATE BAR NO. 004523

6 BEFORE THE ARIZONA CORPORATION COMMISSION

7 CARL J. KUNASEK  
8 Commissioner - Chairman  
9 JIM IRVIN  
10 Commissioner  
11 WILLIAM A. MUNDELL  
Commissioner

12 IN THE MATTER OF COMPETITION IN ) DOCKET NO. RE-00000C-94-0165  
13 THE PROVISION OF ELECTRIC SERVICES )  
14 THROUGHOUT THE STATE OF ARIZONA )  
15 IN THE MATTER OF THE STRANDED COST ) DOCKET NO. E-01575A-98-0472  
16 FILING AND REQUEST FOR A WAIVER OF )  
17 CERTAIN PORTIONS OF THE RULES FILED )  
18 BY SULPHUR SPRINGS VALLEY ELECTRIC )  
19 COOPERATIVE, IN C. )  
20 IN THE MATTER OF THE FILING BY )  
21 SULPHUR SPRINGS VALLEY ELECTRIC ) DOCKET NO. E-01575A-97-0706  
22 COOPERATIVE, INC., OF UNBUNDLED )  
23 AND STANDARD OFFER SERVICE TARIFFS ) SULPHUR SPRINGS VALLEY  
24 PURSUANT TO A.A.C. R14-2-160 ) ELECTRIC COOPERATIVE, INC.  
25 ) MOTION TO CONTINUE HEARING  
26 ) DATE  
27 )  
28 )

22 SULPHUR SPRINGS VALLEY ELECTRIC COOPERATIVE, INC. ("SSVEC"), by and  
23 through their undersigned attorney, hereby requests that the hearing in Docket numbers RE-  
24 00000C-94-0165, E-01575A-98-0472, and E-01575A-97-0706 be continued from February 7,  
25 2000, to a date after the stranded cost proceeding of Arizona Electric Power Cooperative, Inc.  
26 ("AEPCO") is completed and a final order regarding AEPCO's stranded cost methodology is

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4 issued by the Commission, for the reason that SSVEC cannot develop its stranded cost recovery  
5 plan until after AEPCO's stranded cost methodology is known. This Motion is supported by the  
6 attached Memorandum of Points and Authorities.

7 RESPECTFULLY SUBMITTED this 14th day of January, 2000.  
8  
9

10 HITCHCOCK, HICKS & CONLOGUE

11  
12 BY 

13 CHRISTOPHER HITCHCOCK

14 P. O. Box 87

15 Bisbee, Arizona 85603

16 (520) 432-2279

17 MEMORANDUM OF POINTS AND AUTHORITIES

18 I. BACKGROUND

19 The Hearing Division issued a Procedural Order on April 21, 1999 which set SSVEC's  
20 stranded cost/unbundled tariffs hearing for October 13, 1999. This same Procedural Order set  
21 AEPCO's stranded cost hearing for September 1, 1999.

22 A pre-hearing conference took place on September 24, 1999. At that time, the Hearing  
23 Division continued SSVEC's stranded cost hearing until November 18, 1999. This continuance was  
24 granted in an effort to resolve AEPCO's stranded cost matter in order to allow SSVEC the time and  
25 information necessary to resolve theirs.  
26

SSVEC's stranded cost hearing has been continued several times since, always in an attempt

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4 to allow for AEPCO's stranded costs to be resolved. AEPCO's stranded cost hearing is presently set  
5 for February 28, 2000, approximately two weeks after the scheduled date for SSVEC's hearing.

6 II. ARGUMENT

7 SSVEC is a Arizona electric cooperative non-profit membership corporation, currently  
8 purchasing all of its energy requirements under the terms and conditions of an all-requirements power  
9 purchase agreement with AEPCO. The stranded cost recovery plan which SSVEC may submit is  
10 dependent on the outcome of AEPCO's stranded cost hearing. It is reasonable to continue SSVEC's  
11 stranded cost hearing until such time as a final Order has been issued in regard to AEPCO's stranded  
12 cost plan.  
13

14 WHEREFORE, SSVEC respectfully requests that SSVEC's stranded cost hearing, presently  
15 set for February 7, 2000, be continued until after AEPCO's stranded cost proceeding is completed  
16 and a final order regarding AEPCO's stranded cost methodology is issued by this Commission.  
17

18 RESPECTFULLY SUBMITTED this 14<sup>th</sup> day of January, 2000.

19  
20 HITCHCOCK, HICKS & CONLOGUE

21  
22 By 

23 CHRISTOPHER HITCHCOCK  
24  
25  
26

**HITCHCOCK, HICKS & CONLOGUE**

ATTORNEYS AT LAW

POST OFFICE BOX 87

COPPER QUEEN PLAZA

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TELEPHONE (520) 432-2279

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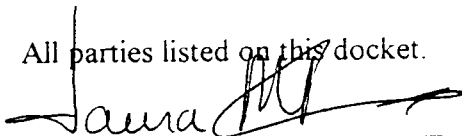
ORIGINAL and ten (10) copies  
of the foregoing filed this  
14<sup>th</sup> day of January, 2000, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Copy of the foregoing mailed this  
14th day of January, 2000, to:

Chief Counsel  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

All parties listed on this docket.



Laura M. Room